



July 11, 2019

The Honorable Rep. Frank Pallone
Chairman
Energy and Commerce Committee
U.S. House of Representatives
2322 Rayburn House Office Building
Washington, D.C. 20005

The Honorable Rep. Greg Walden
Ranking Member
Energy and Commerce Committee
U.S. House of Representatives
2322 Rayburn House Office Building
Washington, D.C. 20005

Dear Chairman Pallone and Ranking Member Walden,

As Executive Director of Protect Our Power, a not-for-profit, electric grid-focused advocacy organization comprised of experts from the electric industry, the physical, cyber defense and financial communities, and former government officials, I want to commend you and the Energy and Commerce Committee for holding the “Keeping The Lights On: Addressing Cyber Threats To The Grid” hearing on Friday July 12, 2019.

Put very simply, we believe there is no more important infrastructure issue in America at this time than making our electric grid more robust and resilient, and doing so with an immediate sense of urgency. Without a secure supply of electricity, our society will suffer grave human health and safety effects, and our economy will grind to a halt. In our modern world, very little works without electricity.

Protect Our Power was established to build consensus among government and industry to strengthen our electric infrastructure against all potential attacks, whether cyber or physical, and to develop the priorities and identify the resources needed for success.

We are currently focused on three priorities that are of relevance to the Energy and Commerce Committee:

- Developing Utility Industry Best Practices for Cyber and Physical Security: Our experts have developed and prioritized a master list of Best Practices that utilities

large and small should adopt, and we are continuing efforts to identify and categorize qualified vendors who can provide related services and products to the utility industry to help implement Best Practices and strengthen the grid.

- Completing Phase 2 of a study on state regulation of utilities, focused on developing recommendations for regulatory improvements and uniformity, including model regulations and legislation. The study was commissioned by Protect Our Power and is being conducted by the Institute for Energy and the Environment at Vermont Law School.
- Commissioning an in-depth analysis on vulnerabilities in the utility industry supply chain, to be conducted by Ridge Global, one of the nation's top security consulting firms headed by former Homeland Security Secretary Tom Ridge.

More broadly, we believe a comprehensive, "moonshot"-style approach is needed to improve and upgrade the grid, one in which we marshal the level of talent, money, focus and determination equal to that which made it possible for us to land on the moon 50 years ago. This moonshot effort must be driven by a well-funded partnership between government and the private sector, and the costs must be borne by all collectively.

We are working to develop an innovative, flexible funding mechanism to incentivize large and small utilities to make necessary investments in cyber security and implement best practices on a sustained basis. We recognize that the impact on electric utility ratepayers will need to be carefully overseen by state regulatory agencies, but we also believe that utilities need to have some reasonable measure of guarantee that effective, prudent expenditures for cyber upgrades will be recouped. We look forward to continuing to share our thinking on this with the Committee in the near future.

In closing, we commend the Energy and Commerce Committee for holding this important hearing and we encourage the Committee to pursue efforts that bring parties in both the public and private sectors together in our shared national interest to protect our nation's electric grid against both physical and cyber threats.

Sincerely,
Jim Cunningham
Executive Director
Protect Our Power